

U.S. Department of Justice

United States Attorney District of New Jersey

970 Broad Street, 7th floor Newark, New Jersey 07102

973-645-2700

October 2, 2020

The Honorable Claire C. Cecchi United States District Judge Martin Luther King Jr. Federal Building and U.S. Courthouse 50 Walnut Street Newark, New Jersey 07102

Re: United States v. Matthew Brent Goettsche, et al.,

Crim. No. 19-877

Your Honor:

The United States of America, through the undersigned, respectfully requests that the Court (1) enter the proposed schedule for filing briefs addressing defendant Matthew Brent Goettsche ("Goettsche")'s appeal of the Honorable Michael A. Hammer's orders detaining Goettsche pending trial and (2) grant the parties leave to file the briefs under seal if necessary to comply with the protective order entered in this case.

The undersigned has conferred with Goettsche's counsel and the parties have agreed to the following dates to submit briefs, if amenable to the Court:

October 9, 2020: Goettsche's Opening Brief November 6, 2020: Government's Response Brief November 20, 2020: Goettsche's Reply Brief

The parties respectfully request further that the Court schedule a

hearing on the matter on December 3, 2020 or another date convenient for the Court.

Finally, defendant believes that material in his briefs may fall under the protective order in this case. Accordingly, the parties respectfully request that the Court grant both parties leave to file their briefs under seal if the parties believe the content contained therein is covered by the operative protective order in this case.

Respectfully submitted,

CRAIG CARPENITO United States Attorney

By: Jamie L. Hoxie

Anthony P. Torntore Assistant U.S. Attorneys

Cc: Rodney Villazor, Esq.

SO ORDERED

s/Claire C. Cecchi
Claire C. Cecchi, U.S.D.J.

Date: 10/5/2020